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October 2, 2017

VIA ECF

Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: Chau v. Hartford Life Ins. Co., et al., 14 Civ. 8484 (S.D.N.Y. 2014) (GHW)

Dear Judge Woods:

I represent Plaintiff, Elizabeth Chau (“Chau”), in the above-referenced matter (the “Action”). I write with the consent of Counsel for Defendant, Hartford, to request an exception to the discovery cutoff date of October 2, 2017, for rescheduling the 30(b)(6) deposition of Hartford previously noticed for September 29, 2017.¹

In light of the upcoming settlement conference, recently scheduled by Magistrate Judge Fox for October 18, 2017, and to avoid potentially unnecessary legal fees and costs, the parties have agreed to schedule the deposition, if settlement of the action is not reached (and subject to any objections to the Notice Hartford plans to serve), on one of the following dates: October 25, 26 or 27, 2017.

Thank you for your consideration of this matter.

Respectfully submitted,

THE RANDO LAW FIRM P.C.

By: /s/ Robert J. Rando
Robert J. Rando (RR-5765)

RJR:lr

cc: Michael H. Bernstein, Esq., Counsel for Defendant, Hartford (via ECF)
Matthew P. Mazzola, Esq., Counsel for Defendant, Hartford (via ECF)

¹ Plaintiff served the Notice of Deposition on September 20, 2017 by email. Counsel for Hartford advised that: they could not attend nor produce a witness on September 29 or October 2, 2017; they would respond with alternate dates; they would not object to an exception to the discovery cutoff date for rescheduling the deposition on an agreed upon date; and, they reserved the right to serve Hartford’s objections to the Notice and topics of inquiry.